

(APPENDIX 1)



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SPD Response to PG&E Mobile App Straw Proposal and Consultant Report

Staff Analysis and Recommendations on Next Steps

May 29, 2024

PG&E Safety Reporting Mobile App Pilot. Application A.19-07-019



**California Public
Utilities Commission**

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Executive Summary

In 2017 and 2018 PG&E's electric infrastructure was responsible for igniting numerous catastrophic wildfires throughout Northern California. In response to these fires, the Commission, among other actions, directed PG&E to establish and maintain an application for mobile devices ("Mobile App") at shareholder expense that would enable customers to report safety concerns associated with PG&E assets rapidly and in the field and include photos, problem description, and location with geographic coordinates.¹

PG&E filed its regulatory Application² pursuant to Commission direction, seeking to introduce the Mobile App as a provisional Pilot³ program whose reach would extend only to the State's most wildfire-threatened communities, namely California Wildfire Threat Districts (HFTDs) 2⁴ and 3 (High and Very High risk).^{5 6} The Commission approved⁷ PG&E's proposal with modifications, adding, among other requirements, an independent consultant evaluation of the pilot to better understand the initiative's value and performance.

¹ "Pacific Gas and Electric Company shall file an application within 30 days after the issuance of this Order to develop an open source, publicly available asset management/ database and mobile app as described in this order." -- Ordering Paragraph 13, CPUC Investigation [I.19-06-015](#), June 27, 2019, p. 20. Order Instituting Investigation on the Commission's Own Motion into the Maintenance, Operations and Practices of Pacific Gas and Electric Company (U39E) with Respect to its Electric Facilities; and Order to Show Cause Why the Commission Should not Impose Penalties and/or Other Remedies for the Role PG&E's Electrical Facilities had in Igniting Fires in its Service Territory in 2017.

² Application [A.19-07-019](#), July 29, 2019. PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) MOBILE APPLICATION AND SUPPORTING SYSTEMS PILOT APPLICATION.

³ Within its Application PG&E provides its reasons for including a pilot construct and advocates for future cost recovery eligibility in what might be a hypothetical post-Pilot stage of the Mobile App program: "As described above, the efficacy of a mobile application in reducing catastrophic wildfire risk has not been tested. To ensure that the mobile application effectively maximizes the potential of the public to contribute to maintenance of its assets while appropriately solving the issues identified above, PG&E proposes to develop and launch a pilot program with a limited number of users in a subset of PG&E's service territory. While PG&E will not request cost recovery for the Mobile App Pilot, PG&E respectfully requests that any decision about who bears the cost of any further development and continued operation be deferred until after a fuller understanding can be developed through the Mobile App Pilot. PG&E reserves the right to request incremental recovery in the future." A.19-07-019, p. 9.

⁴ More precisely, PG&E's Application, at page 10, called for a program that would target just Wildfire Threat District 3 (Very High risk). In response to calls from intervenors and Staff for the initiative to address a broader area, PG&E revised its targeted geographic area to also encompass Wildfire Threat District 2 (High risk). PG&E's effectuated this revision to the utility's position via a [Revision to Mobile Application Pilot](#), filed March 20, 2020, at page 34.

⁵ Interactive online maps available here: [Wildfire Threat Districts 2 and 3 \(High and Very High risk\)](#).

⁶ At the request of intervenors, PG&E agreed to make the Mobile App available to all electric customers, but those outside of the wildfire-targeted areas were not afforded support elements such as marketing, outreach, and education (ME&O). Additional distinctions regarding usage outside the targeted user areas are described below within Issue 1, analysis section.

⁷ Decision [D.20-10-003](#), October 12, 2020.

Some ten months later, in August 2021, PG&E made publicly available its Mobile App in both Android and Apple versions under the branding “*Report It.*”

In 2023, a year-long consultant evaluation effort concluded, yielding various findings and recommendations within a Consultant Report⁸ produced by consultant Opinion Dynamics. Pronouncing the Mobile App “effective at preventing wildfire and improving public safety,”⁹ the Consultant Report advised, “the app’s value is significant and worthy of development beyond the pilot,”^{10 11} recommending continuation and expansion to all of PG&E’s electric service territory.¹² In tandem with the Consultant Report, PG&E filed a Straw Proposal¹³ articulating the utility’s near-term vision for the Mobile App initiative. There, PG&E expressed agreement with the Consultant’s recommended change of status from Pilot to permanent program status and indicated an intention to seek cost recovery for expenses incurred for the Mobile App to support post-Pilot-stage activity to the extent allowable.¹⁴

This Staff Report offers an advisory and interpretative function and provides a recommendation on the continuation of the Mobile App. Although the Consultant supports continuation and recategorization of the Mobile App as a permanent program, Staff is unable to support a recommendation to change the Mobile App status to permanent at this time. The Consultant’s evaluation Report does not make the necessary evaluations of the Mobile App to enable Staff to make a conclusion about the safety benefits of the Mobile App. Staff does not find that the Consultant Report contains sufficient evidence to assess the core function of the app – its ability to positively impact PG&E’s safety record. Staff recommends that PG&E continue the existing Pilot program as it is now scoped but with additional regulatory reporting and data preservation provisions to further compile vital safety impact data and provide for future Mobile App program

⁸ Evaluation Final Report, November 6, 2023, “Consultant Report.”

⁹ Consultant Report, pp. 7, 57.

¹⁰ Consultant Report, pp. 55.

¹¹ Additionally, the Consultant states, “Our evaluation indicates the app is effective at preventing wildfire and improving public safety. More than 20% of the safety reports submitted from the time the app became publicly available (July 2021) through mid-February 2023 were confirmed as clear and present ignition risks. More than 40% of submissions during the same time period constituted actual safety concerns (i.e., posed hazards including and beyond wildfire were not previously known to PG&E). Perhaps equally important, the app appears to encourage users to proactively scan their environment for safety concerns. This suggests the app is driving greater awareness and vigilance against wildfire and public safety risks.” Consultant Report, p. 7.

¹² “[W]e conclude that [the Mobile App] is cost-effectively delivering a critical benefit to PG&E customers and the State’s energy safety goals and should continue to be offered and expanded to other parts of the territory,” Consultant Report, p. 59.

¹³ PG&E Straw Proposal, September 29, 2023.

¹⁴ “*The costs to develop and operate the mobile app and asset management system/database will be at shareholder expense*” -- Ordering Paragraph 13, CPUC Investigation I.19-06-015, June 27, 2019, p. 20. Order Instituting Investigation on the Commission’s Own Motion into the Maintenance, Operations and Practices of Pacific Gas and Electric Company (U39E) with Respect to its Electric Facilities; and Order to Show Cause Why the Commission Should not Impose Penalties and/or Other Remedies for the Role PG&E’s Electrical Facilities had in Igniting Fires in its Service Territory in 2017.

assessment and/or evaluation. Staff also recommends that PG&E be granted authorization to modify¹⁵ the existing Mobile App approach from two dedicated downloadable apps serving Apple and Android smartphones to a single web-based app that can be accessed by any internet-enabled¹⁶ device to dispense with the need to undertake ongoing software updates to facilitate changes made in Android or Apple smartphone operating systems.

¹⁵ It has not been determined precisely how long it would take to action this change. However, given that PG&E, working with a vendor, was able to bring to market two distinct downloadable apps within approximately six months' time, it's estimated that the utility could reasonably introduce the web-based version within half a year.

¹⁶ This may elicit the question of "what about submitting reports from the field where internet access may be limited or unavailable?" PG&E has indicated that a web-based app without internet connectivity would function much the same as with the existing Mobile App approach, which now enables users to compose and enter a report offline and then transmit once internet capability has been restored.

Issue 1: PG&E Proposal and Pilot Next Steps

1.1 PG&E's Position

PG&E seeks to make the Mobile App a permanent program and states that it intends to seek cost recovery via a general rate case for costs associated with the continuation of a mobile app, either web or app based, beyond the pilot phase of this program. PG&E declines to expand its target market to its full-service territory, but indicates it may be open to this as well as to including its gas line of business at some future point if certain “cost-benefit” considerations are satisfied. The PG&E Straw Proposal puts forward three options, discussed in detail on the following page, with a utility recommendation for Option 1, the simplest and lowest-cost option, and which represents a change from existing conditions. PG&E closes by providing a list of items that it derived and that it deemed to be out of scope for the purposes of administering the Mobile App. PG&E’s list pertains to additional functionality for the Mobile App apart from its existing purpose¹⁷ of facilitating the submittal of visible¹⁸-issue safety reports. Many of these items date to the early days of the proceeding and had been requested by intervenors, staff, or both.

The three options put forward by PG&E, include:

- **Option 1:** Discontinuation of the Mobile App as two downloadable versions and initiation of a new universal compatibility¹⁹ “mobile-friendly web-based version.”
 - Estimated program cost of \$3.4 million for 2024, and \$3.7 million for 2025.^{20 21}
- **Option 2:** Continuation of the Mobile App with downloadable versions for Apple and Android. PG&E characterizes this option as “maintaining the status quo,” although it would not retain Pilot status and would enable various new hiring and overhead costs, among other changes that PG&E aims to incorporate across the three options.

¹⁷ One exception is that PG&E indicates that prior to 2026 it expects to “develop capability to report outages” via the Mobile App. Straw Proposal, p.4.

¹⁸ Visible assets as defined by PG&E are, “Primarily PG&E overhead lines and facilities, as the majority of gas assets are underground.” Straw Proposal, p.3.

¹⁹ Universal compatibility would cover all mobile personal computing devices – smartphones, whether Apple or Android, tablets, laptops, and desktop computers irrespective of operating system.

²⁰ PG&E’s annual costs in 2021 and 2022 for total Mobile App expenses were reported as less than \$3.2 million. PG&E’s reported estimated costs for 2023 and 2024 are \$3.0 million annually. \$5.2 million of this two-year \$6.0 million spending amount would be put toward refinement of and capacity toward the Mobile App. PG&E reports operations and maintenance costs of approximately \$0.84 million per year beginning 2025. Source: Opinion Dynamics Consultant Evaluation Final Report, November 6, 2023, p. 53.

²¹ Interestingly, the consultant report suggests that PG&E has future designs on scaling the Mobile App to its full electric service territory. “This includes \$5.2 million in 2023 and 2024 to refine the app and build an app infrastructure that will accommodate PG&E’s 16 million customers.” Consultant Report, p. 53.

- Estimated annual program costs of \$4.2 million for 2024, and \$4.2 million for 2025.
- **Option 3:** Continuation of the Mobile App with downloadable versions for Apple and Android and with the addition of a new web-based “app.” PG&E characterizes this option as a hybrid of Options 1 and 2.
 - Estimated program costs of \$6.75 million for 2024, and \$5.55 million for 2025.

1.2 Analysis of PG&E Proposal

Staff Characterization Summary and Overview

PG&E’s proposal bears resemblance to the earlier proposal the utility put forward in its initial Application for the Mobile App pilot. There too, the utility argued that an internet-based, or “web-based,” mobile app would offer superior results at lower cost than developing and maintaining one or more downloadable or “native” apps.^{22 23} In proposing to discontinue two existing native (downloadable) app versions in favor of a single web-based app, PG&E seeks to revive this approach. Additionally, PG&E proposes to recategorize the Mobile App to a permanent program from its provisional pilot status, and proposes changing the existing regulatory reporting requirement from a quarterly basis to an annual basis.^{24 25}

The consultant evaluation report (described more fully within Issue 2 below) provides sufficient data on the costs of the Mobile App for rough baseline comparison purposes. According to figures provided within the consultant evaluation report, PG&E’s recent spending has been hovering at around \$3 million per year. More than \$2 million of the reported costs were interim provisional costs incurred, as the utility built out the Mobile App and fine-tuned it. Based on these costs the consultant indicated that PG&E’s operational costs are expected to level off at between \$0.84 million and \$1.6 million per year depending on whether “triage labor”

²² The Commission ultimately was not persuaded by this argument, reasoning that the downloadable native app approach “more closely conforms to the Commission’s directive in I.19-06-015.” Decision D.20-10-003, October 12, 2020, p. 14.

²³ The CPUC offered PG&E the option of including a web-based app version as an additional offering so as to “offer customers more choice,” but PG&E declined. D.20-10-003, p. 15.

²⁴ “Pacific Gas and Electric Company (PG&E) shall file and serve on the service list for this proceeding quarterly status reports on its activities and progress on the mobile application pilot. The first report shall be due three months after the effective date of this decision. This directive expires at the end of the pilot.” D.20-10-003, pp. 12, 50. The quarterly reports summarize PG&E marketing efforts, growth and market trends and user activity, along with updates on how the utility has gone about implementing software updates.

²⁵ Also on a course to expire is the Commission’s directive on required data preservation. Namely, that PG&E “preserve all data submitted via the mobile app deemed invalid and/or rejected (including emergency matters) for a period of four years from the launch date of the mobile app pilot for Commission evaluation purposes, unless preservation for a longer period of time is required by law.” D.20-10-003, Ordering Paragraph 1a, p. 49. Staff note: the effective date of expiration would be four years after August 6, 2021.

costs are included.²⁶ Yet PG&E’s proposal suggests that future total annual program costs for 2025 would range from \$3.5 million to \$5.5 million, a significantly higher sum (nearly double at the high end) than existing conditions. PG&E explains that enabling a new ratepayer-based funding source would facilitate the utility’s plans, which include necessary operational improvements, enhanced marketing efforts, and hiring of permanent dedicated lead staff.²⁷

PG&E prefers Option 1, the least costly and complex of the three. Below staff characterizes each of the three options with an opinion on desirability and appropriateness.

Option 1: Discontinuation of the Mobile App as two downloadable versions and initiation of a new universal compatibility “mobile-friendly web-based version.”

- Estimated program cost of \$3.4 million for 2024, and \$3.7 million for 2025.

Staff Assessment of Option 1

Option 1 is the least-cost option with the fewest offerings and would discontinue the Apple and Android downloadable apps in favor of one web-based “app.”

Advantages. Option 1’s web-based app feature would appear to resolve several intractable issues evident within the existing approach taken with the Mobile App Pilot. Namely, it would:

- enable PG&E to integrate a mobile app more fully with its built-out online customer portal interface to offer more functionality while minimizing additional cost and effort,
- offer compatibility with computer operating systems such as Windows, which do not support Android or Apple operating systems,
- offer compatibility with older Android or Apple smartphones having outdated operating systems and which are not now supported, resulting in the absence of compatibility and access for users of older smartphones who may be unable to download the Mobile App,
- obviate PG&E’s practice of throttling²⁸ new users who wish to submit reports without delay, and

²⁶ Consultant Report, pp. 52-54

²⁷ Staff notes that an additional area of concern with the PG&E Straw Proposal’s three options is that all seek implicit sign off for elements to be enabled by supposed-ratepayer-funded expanded hiring and infrastructure commitments which are not adequately explained, and which insufficiently detail planned future Mobile App annual spending to be put toward capital investment or operations and maintenance (O&M) expenditures.

²⁸ From the Mobile App consumer product’s inception PG&E has required that a new user outside of the targeted geography wishing to submit a safety report be subject to a waiting period of one to two weeks pending receipt of an access code or all-clear signal from PG&E. However, PG&E, in its “Quarterly Status Report” dated April 30, 2024, and providing Mobile App program

- do away with the burden of having to continually maintain two consumer-oriented tech products with relatively low user numbers.

Disadvantages. However, were PG&E to pursue this option, it would mean discontinuation of the Apple downloadable version, which accounts for about nine-tenths of all Mobile App activity,²⁹ potentially resulting in some future lesser usage activity by iPhone users. It would mean the end of the dedicated Android app version as well.

Net Benefit. On the whole, the advantages that Option 1 brings to the Mobile App from a consumer-delivery perspective and the many existing problems it resolves, are clear and compelling. Option 1 does more (with less cost) to further the initiative’s reach and accessibility. It also promises to increase the functionality of the Mobile App by way of leveraging the web-based app’s promised compatibility with existing PG&E online consumer resources. While the loss of two downloadable apps – as now exists – as a tradeoff for the one web-based app might prove disruptive to the habits of existing users accustomed to the convenience of a dedicated app, Option 1 is more equitable in its ability to better serve users of older smartphones who are more likely to be low income. For this reason, Option 1 can be said to be more just than Option 2, which closely resembles a continuation of the status quo.

Option 2: Continuation of the Mobile App with downloadable versions for Apple and Android. PG&E characterizes this option as “maintaining the status quo,” although it would not retain its pilot status and would, as with the other two options, enable various new hiring and overhead costs, potentially at future ratepayer expense, among other changes.

- Estimated annual program costs of \$4.2 million for 2024, and \$4.2 million for 2025.

Staff Assessment of Option 2

Option 2 is the mid-cost option and the one that most resembles existing conditions, as it continues existing Mobile App offerings by preserving both the Apple and Android downloadable versions.

Advantages. Option 2 offers the advantage of preserving a dedicated downloadable app for both Apple and Android smartphones, devices, and their users.

data for the first quarter of 2024, declared that it had suspended this practice: “Based on use feedback PG&E removed the “waitlist” feature for new users,” p. 2. Staff welcomes this change, but notes as a voluntary action, it is reversible at PG&E’s discretion. As such, staff notes that a permanent rule is advisable.

²⁹ The Consultant Report found that 87 percent of downloads are attributable to Apple devices. (p. 50) This trend appears to be holding if not accelerating with PG&E reporting 89 percent of downloads attributable to Apple devices in its quarterly regulatory reporting period ending September 30, 2023.

Disadvantages. Continuing the status quo would expend cost and effort of maintaining two consumer-oriented tech products for only potentially incrementally more user activity, given that Android accounts for roughly ten percent of all reported downloads.

Net Benefit. On the whole, the primary advantage of Option 2 is that it minimizes program disruption from a consumer perspective by preserving the existing Mobile App consumer-delivery vehicle of independent Android and Apple downloadable apps. And while there is something to be said for the old adage of “if it ain’t broke, don’t fix it,” there are other, potentially more compelling, considerations to be weighed. To wit, if viewed through a lens of equity and social justice, one must consider the fact that almost 90 percent of combined usage of the two existing apps is attributable to Apple devices and smartphones. Some potential exists that the user base of Android smartphones, which generally retail for considerably less than Apple smartphones, might be increased were the initiative to shift to a web-based app delivery model as it might attract some users who rely on older Android smartphone models not now served by the existing downloadable Mobile App.

Option 3: Continuation of the Mobile App with downloadable versions for Apple and Android and with the addition of a new web-based “app.”

- Estimated program costs of \$6.75 million for 2024, and \$5.55 million for 2025.
- PG&E characterizes this option as a hybrid of Options 1 and 2.

Staff Assessment of Option 3

Option 3 is the highest-cost option with the most offerings and would continue the Apple and Android downloadable apps in addition to introducing a new web-based “app.”

Advantages. Option 3 offers the advantage of preserving a dedicated downloadable app for both Apple and Android users. Additionally, Option 3’s web-based app feature would appear to resolve several intractable issues with the existing approach taken under the pilot, namely, it would:

- enable PG&E to integrate a mobile app more fully with its built-out online customer portal interface to offer more functionality by way of the new web-based app capability,
- offer compatibility with computer operating systems such as Windows, which do not support Android or Apple,
- offer compatibility with older Android or Apple smartphones, thereby providing their users with access to the Mobile App,
- obviate PG&E’s practice of throttling new users who wish to submit reports without delay.

Disadvantages. Costs are higher than those for Option 1 or Option 2, in part because this approach entails additional choice offerings while introducing some element of program redundancy. Option 3 may pose near-term challenges for PG&E to address this added workload and delegate sufficient, qualified staff.

Net Benefit. On the whole, the advantages that Option 3 brings to the Mobile App from a consumer-delivery perspective and the many existing problems it resolves, are desirable. As with Option 1, this alternative promises to further the initiative's reach and accessibility while amplifying the functionality of the Mobile App by way of its compatibility with existing PG&E online consumer resources. Additionally, web-based app nature of Option 3 (as is also the case for Option 1) introduces an additional measure of equitability by way of better serving users of older smartphones who might otherwise not have access to the Mobile App and its safety reporting features. Finally, Option 3, by preserving two downloadable apps (one for Android and one for Apple smartphones), provides the best prospects for avoiding disruption to existing-consumer use habits, which might result in the attrition of some existing users. In closing, it bears noting that Option 3, as the most ambitious and far reaching, would be the most burdensome to PG&E whereas the utility is presently seeking regulatory relief for its Mobile App initiative. As such, it should be noted that in past instances when the utility has been directed to provide more user choice for this program, PG&E has responded by requesting additional time for program implementation. In such an instance here it's foreseeable that the need to hire additional professional staff for program operations³⁰ and expanded coding functions may require some months before PG&E can fully implement Option 3. Based on past precedent, an expected timeframe for the utility to rise fully to meet this directive would be within six months' time.

Safety Considerations

Inconclusive Findings

One key consideration for staff to weigh in assessing the Mobile App and potential next steps is whether the initiative has any tangible impact on safety. The Consultant Report has yielded some useful information on the qualitative metrics associated with the Mobile App, but the initiative's criticality was less clearly articulated.

Although some quantified information on usage was provided, there was an absence of measurable data to inform any resulting favorable safety impacts. Unanswered questions that remain include:

- Were critical safety issues brought to light that may not have been identified otherwise, or addressed as rapidly without the Mobile App? and
- What share of "invalid" or non-safety reports served as a distraction or interfered with PG&E's ability to address true safety concerns of the kind identified by standard inspections?

For these reasons of incomplete, inconclusive, and less than compelling data and findings surrounding tangible safety impact benefits captured by the Mobile App initiative, staff at this time is unable to support recategorizing the pilot to permanent program status.

³⁰ PG&E indicates that it is proactively taking steps to see to it that the utility has adequate staff to cover its needs as the Mobile App pilot matures, with a recent regulatory filing disclosing the hiring of new "dedicated Triage coworkers," which are PG&E staff whose primary function would be to review Mobile App user reports. Source: "Quarterly Status Report" dated April 30, 2024..

All of that said, some favorable indicators pointing to potential meaningful safety improvement and risk reduction resulting from the existence of the Mobile App are evident and worthy of mention. These include:

- Many users who submitted a safety complaint indicated that they were unlikely to otherwise report a safety problem.
- Customers who used it had positive feedback to provide on the Mobile App.
- The initiative introduces a strand of grassroots-type accountability into the energy-safety regulatory-oversight arena that would not otherwise exist by way of establishing a publicly-available record of crowdsource-derived safety complaints.
- A sizable share of reports submitted were found to identify a deficiency, safety risk, or violation of a safety rule implicating PG&E electric assets, with a subgroup of these valid reports bringing to light an issue entailing risk of ignition. (Specifically, of some 2,230 reports submitted, about 1,000 of these were deemed to be valid, with 355 of these reports identifying a non-emergency ignition risk)
- The Mobile App empowers customers by:
 - 1) giving them a more tangible and structured means to express their concerns; and
 - 2) tracking the utility's response to those concerns.

1.3 Issues Identified within Existing PG&E Program

Uneven PG&E Timeliness in Fully Resolving Identified Safety Complaints

Staff have found instances of unresolved Mobile App-derived safety reports open for more than one year by referencing the open-and-unresolved safety-complaints log available within the platform portal. Some of these unresolved complaints identify ignition risk or other safety issues, which have persisted for one year or more despite PG&E responses logged on the Mobile App pledging a corrective action by a set date that has passed. Interestingly, Staff observed that a number of these persistent open report cases, unresolved and implicating PG&E assets, exist within just a three-mile radius of the Commission offices in San Francisco.

Viewed through the lens of a lesson learned and an improvement opportunity, Staff believes that one high-potential uncaptured benefit of the Mobile App to date has to do with enabling greater knowledge and understanding of PG&E's poles and energized overhead wires with regard to how the utility goes about resolving an issue once the public has reported a perceived safety deficiency. Such items that would be valuable for facilitating knowledge and understanding by Staff include:

- (a) time taken in processing a complaint,
- (b) turnaround time promised by PG&E to resolve an issue entailing asset repair or replacement, and
- (c) actual time transpired before the utility, in fact, resolved and closed out the issue.

Generally, as these backlogged items accrue on the Mobile App portal, PG&E has pegged a date for repair and resolution three or four months out from the date that staff conducted the spot-check exercise. It would be valuable to know if such a planned date for repair and resolution is one that PG&E continues to

push out further as the date for repair passes. Such data could be furnished by PG&E on an ongoing basis as part of a more comprehensive regulatory reporting mandate.

For this reason, staff advises that should the Commission take action to enable continuation of the Mobile App pilot, that it attach an enhanced regulatory reporting requirement, as detailed below in Staff Recommendation, Section 1.4, detailing the utility's responsiveness and timeliness in resolving reported safety deficiencies with its assets and the persistence of unresolved safety complaints raised by way of the Mobile App. As such, the pilot would be strengthened to illuminate the issue of how public-facing assurances made by PG&E to resolve an identified problematic electric asset square with actual turnaround time.

Staff believes that one simple and effective remediation approach that the Commission may employ as a first step to addressing this problem would be to have PG&E tally and declare these instances at three-month intervals once they have persisted for more than nine months and become past due.

1.4 Staff Recommendation

Installing Added Safeguards as Stipulations and Satisfying Conditions

Staff recommends that the Commission afford PG&E the latitude to modify its existing Mobile App pilot according to any of the three options that the utility has put forward, on the condition of the following:

Required Stipulations

PG&E shall:

- A. not modify from pilot to permanent status the Mobile App initiative at this time, but shall adhere to provisions for obtaining expanded data and findings to support evidence of tangible safety benefit, as set forth below in Condition 1;
- B. not be eligible to seek future cost recovery for expenses incurred in the establishment and administration of the Mobile App initiative except to the extent that the applicable qualifying standards, as set forth below in Condition 2, are first fully satisfied;
- C. undertake a new enhanced reporting compliance regimen to, among other things, track, trend, and bring to light the utility's responsiveness to addressing delinquent unresolved deficient assets reported to the utility, as set forth below in Condition 3, Condition 4, and Condition 5;
- D. in continuing the Mobile App initiative, maintain production and filing of its existing quarterly reporting updates on Mobile App activities, trends, and progress;
- E. expand existing regulatory reporting efforts for the Mobile App initiative to incorporate both the Condition 1 standards outlined below and to provide for disclosure of the utility's activities and progress toward increasing its capacity, workforce, and spending as described in its Straw Proposal to the extent that this course of action is pursued and/or remains in progress and;

- F. PG&E shall continue to preserve pertinent program records and data beyond the approaching four-year expiration date, until further notice.³¹

Required Satisfying Conditions

Condition 1: Make record of and report data to inform the questions of:

- Were critical safety issues brought to light that may not have been identified otherwise, or addressed as rapidly without the Mobile App?
- What share of “invalid,” or non-safety, reports served as a distraction or interfered with PG&E’s ability to address legitimate safety concerns of the kind identified by routine inspections?

The effective filing date satisfying Condition 1 shall be the first existing quarterly report iteration that affords PG&E 90 days to respond from the date its prior quarterly report was due. In filing the new combined, expanded quarterly reports, PG&E is to be afforded an allowance of up to 30 days’ processing time from the close of each reporting period to the date of filing.

Condition 2: Collect sufficient data per Condition 1 to credibly support and justify any future ratepayer funding request that PG&E wishes to pursue within its 2027 GRC application or subsequent regulatory application should the 2027 GRC application timeframe be unworkable.

Condition 3: PG&E will commence enhanced annual reporting that will detail, track, and trend PG&E staff time expended or diverted by invalid, 911-level, or non-safety issue reports, and analyze the data to offer proposed solutions or remedial suggested actions. Additionally, for poles and energized overhead wires, PG&E should characterize and quantify response and resolution (abatement) times for complaints fielded via the Mobile App against average times required in addressing similar issues in similar geographies reported to its call center. The first report shall be filed within 14 months of the date of the final Decision and cover no less than the subsequent twelve months from the the date of the final Decision; for subsequent filings PG&E is to be afforded an allowance of up to 60 days’ processing time from the close of each reporting period to the date of filing.

Condition 4: PG&E, for its poles and energized overhead wires, will commence enhanced annual reporting that will detail, track, and trend delinquent unresolved safety complaints submitted and logged via the Mobile App. Delinquent is defined as those safety complaints that remain unresolved after nine months or more from the date the user submitted a report. The effort should track year

³¹ As mentioned above in a prior footnote, nearing expiration is the Commission’s directive on required data preservation. Namely, that PG&E “preserve all data submitted via the mobile app deemed invalid and/or rejected (including emergency matters) for a period of four years from the launch date of the mobile app pilot for Commission evaluation purposes, unless preservation for a longer period of time is required by law.” D.20-10-003, Ordering Paragraph 1a, p. 49. Staff note: the effective date of expiration would be four years after August 6, 2021.

over year performance for the share of reports that qualify as delinquent and PG&E should establish an attainable goal to limit the share of reports falling into delinquent status. Minimum information to be provided, for each qualifying complaint, shall include:

- (a) description of and location of incident and date of submittal;
- (b) number of days that the report has remained open;
- (c) time taken to process the complaint and make an assignment for field inspection;
- (d) time taken to make an initial field inspection;
- (e) time taken to make a determination of safety hazard and course of action;
- (f) initial estimated date assigned for resolution including repair or replacement;
- (g) subsequent estimated date assigned for resolution including repair or replacement, as applicable, with a tally of number of times a resolution date was rescheduled, and days elapsed from date of initial complaint and actual resolution

Filing timelines for Condition 4 are consistent with those of Condition 3 above; Condition 3 and Condition 4 requirements may, at PG&E's discretion, be combined into a single joint annual report.

Condition 5: PG&E will commence a mini version of the annual report outlined within Condition 4, that will serve as an ongoing quarterly reporting update that will catalogue and provide a read on PG&E's delinquent unresolved reports within a table addressing Items (a) and (b) above.

Filing timelines for Condition 5 shall have PG&E file its first "delinquent unresolved safety complaints" quarterly report within six months of the date of the final Decision. PG&E is to be afforded an allowance of up to 30 days' processing time from the close of each reporting period to the date of filing.

PG&E may not combine or file the Condition 5 quarterly report jointly with another ongoing report mandate.

In closing, staff advises that any action that the Commission might take to preserve the Mobile App should incorporate these additional standards in order to enable Staff to adequately appraise PG&E performance and measure any resulting safety impact more fully.

Issue 2: Consultant Evaluation Study and Report

2.1 Summary of Staff Position

The Consultant Report, as submitted by the firm of Opinion Dynamics, yields several interesting and useful findings about PG&E's Mobile App and how it is being received positively by its various users, including PG&E staff and contractors, for whom the choice of a technology-enabled option for reporting safety concerns to the electric utility is preferred over the customary means of speaking with a PG&E 1-800 call center generalist who may encounter issues as disparate as billing questions or new-service appointments. The Report thus sheds a ray of light on the somewhat opaque subject of PG&E's customer service call center operations -- the utility's default outlet for fielding customer concerns and questions, including those pertaining to safety issues, deficient utility assets, and violation of a regulatory rule. The Report also highlights spending levels and offers some rough benchmarks for comparison purposes. As mentioned above within the Issue 1 discussion, the Report also reveals that Mobile App usage is overwhelmingly dominated by Apple users.³² The findings, conclusions, and recommendations provided by the consultant are useful and facilitate improved understanding of the workings of and public reception to the Mobile App and, as such, Staff has no major objections to these elements of the Consultant Report. However, as explained previously, the Consultant Report lacks sufficient detail to adequately inform Staff's ability to discern the merits of the Mobile App from a safety perspective. Specifically, any benefit in reducing the risk of catastrophic wildfires that may result from the initiative's existence.

2.2 Summary of Consultant Report Findings

- PG&E efforts to market the Mobile App to targeted customers were found to be adequate on the basis of more than 50,000 downloads.³³ (p. 13)
- The number of active users, defined as those having submitted one or more reports via the Mobile App, was found to be 1,565.³⁴ (p. 16)
- PG&E efforts put toward public education on correct usage of the Mobile App trailed those of its marketing efforts, suggesting room for improvement. (p. 14)

³² As pointed out in a prior footnote, the consultant report revealed that 87 percent of downloads are attributable to Apple devices (p. 50). This trend appears to be holding if not accelerating with PG&E reporting 89 percent of downloads attributable to Apple devices in its quarterly regulatory reporting period, ending September 30, 2023.

³³ Data last updated February 10, 2023, the end date for Pilot activity for the purposes of the consultant evaluation effort.

³⁴ Additionally, most Mobile App users submitted just one report (77 percent), while 15 percent of users were found to have submitted two reports. (p. 15)

- The public accounted for 89 percent of all reports, with 11 percent coming from PG&E staff and partnering or allied fields such as tree trimmers. (p. 17)
- Sixty percent of Mobile App users who made a report of a safety concern indicated that they had not previously contacted PG&E about a safety issue. (p. 36)
- Two out of five Mobile App users who made a report of a safety concern indicated that without the Mobile App, they would have been unlikely to report the issue to PG&E. (p. 37)
- Of some 2,230 reports submitted, about 1,000 of these were deemed to be valid, with 355 of these reports identifying a non-emergency ignition risk. (pp. 49-50)
- Report submission volumes are about evenly divided between targeted areas and non-targeted areas. (p. 52)
- Among passive users, defined as those having submitted no reports via the Mobile App, about 30 percent have used the Mobile App four or more times to view data submitted by others and to monitor PG&E's response. (p. 28)
- Overall, 75 percent of users reported satisfaction with the Mobile App (p. 31), with 59 percent indicating the product met or exceeded their expectations. (p. 33)
- Annual costs in each of the first two years, 2021 and 2022, averaged \$3.1 million including development, outreach, launch, maintenance, and triage (i.e., review and processing of safety reports). (p. 53)
- PG&E anticipates spending \$3.0 million per year on average in 2023 and 2024. This includes \$5.2 million in 2023 and 2024 to refine the Mobile App and build an app infrastructure that will accommodate PG&E's 16 million customers. Once the app has been developed to support a greater number of users across the service territory in 2025, PG&E anticipates operations and maintenance will run about \$838,000 per year. (p. 53)
- PG&E's call center can be expected to receive more than 5.5 million customer calls in a typical year, with 7.6 percent of calls involving a safety issue. In turn, PG&E estimates having spent approximately \$1 million to field more than 420,000 customer calls reporting a safety concern, for a reported cost of \$2.44 per safety-related call. (p. 54)
- PG&E's Mobile App Pilot, in 2021 and 2022, received roughly between 600 and 1,300 safety reports submissions in each of the two years. In turn, PG&E reports having spent between \$3.0 million and \$3.2 million in each of the two years. These costs come to a year-2021 cost per submission of about \$5,200, and a year-2022 cost per submission of about \$2,400. (p. 53)

(SEE TABLES NEXT PAGE)

Consultant Report Table 1. Comparison of Call Center and Mobile App Costs (p. 55)³⁵

Reporting Method	Estimated Cost Per Unit	Total 2022 Spending
Call Center (Safety-Related Calls)	\$2.44 per call	\$1,029,288
Report It Mobile App	\$2,364 per submission ³⁶	\$3,049,659

Consultant Report Table 2. Mobile App Pilot Costs Per Submission (Including Duplicates) (p. 53)

Year	Spent	Downloads	Submissions*	Submission Rate	\$/Submission
2021 act.	\$3,190,446	13,422	614	5%	\$5,196
2022 act.	\$3,049,659	19,616	1,290	7%	\$2,364

Consultant Report Table 3. PG&E Safety Effort Expense Comparison (in \$1,000) (p. 54)

Related Activities	2021	2022	2023	2024	2025
Vegetation Management	1,751,067	1,980,005	1,865,536	1,865,536	1,865,536
Call center annual budget	57,349	58,687	58,018	58,018	58,018
Community Engagement	55,129	54,667	54,898	54,898	54,898
PG&E Mobile App Development	2,526	2,271	2,411	2,786	838
PG&E Mobile App ME&O (Marketing, Education & Outreach)	138	12	22	TBD	TBD
PG&E Mobile App Training Materials	128	---	---	TBD	TBD
PG&E Mobile App Triage	384	767	767	767	767
Total Expenditure PG&E Mobile App	3,176	3,051	3,200	3,553	1,605

³⁵ Staff qualifies this consultant cost comparison table to note that the Mobile App to Call Center comparison example is not a precise apples to apples comparison in that the Call Center cost figures do not account for hefty initial program startup expenses.

³⁶ Includes costs related to technological development of mobile app, including code writing, troubleshooting and the like.

(END APPENDIX 1)